

FILED - GR  
October 22, 2012 12:09 PMTRACEY CORDES, CLERK  
U.S. DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN

BY: ns / SCANNED BY ns 10/22

In the United States District Court  
For the Western District of MichiganCharles H. Madison

(Enter above the full names of all plaintiffs, including prisoner number, in this action.)

v. LARRY STELYNA - KENT COUNTY JAIL  
CORIZON MEDICAL INC  
DENNIS B LEIBER

1:12-cv-1145

Paul L Maloney - Chief U.S. District Judge  
Joseph G Scoville - U.S. Magistrate Judge

(Enter above the full name of the defendant or defendants in this action.)

COMPLAINTI. Previous Lawsuits

**CAUTION: The Prison Litigation Reform Act has resulted in substantial changes in the ability of incarcerated individuals to initiate lawsuits in this and other federal courts without prepayment of the required \$350 filing fee. Accurate and complete responses are required concerning your litigation history. Generally, a plaintiff's failure to accurately and completely answer the questions set forth below will result in denial of the privilege of proceeding *in forma pauperis* and require you to pay the entire \$350 filing fee regardless whether your complaint is dismissed.**

- A. Have you ever filed a lawsuit while incarcerated or detained in any prison or jail facility? Yes ☒ No ☐
- B. If your answer to question A was yes, for each lawsuit you have filed you must answer questions 1 through 5 below. Attach additional sheets as necessary to answer questions 1 through 5 below with regard to each lawsuit.
1. Identify the court in which the lawsuit was filed. If it was a state court, identify the county in which the suit was filed. If the lawsuit was filed in federal court, identify the district within which the lawsuit was filed.  
MICHIGAN - KENT COUNTY
  2. Is the action still pending? Yes ☒ No ☐
    - a. If your answer was no, state precisely how the action was resolved: \_\_\_\_\_
  3. Did you appeal the decision? Yes ☐ No ☐
  4. Is the appeal still pending? Yes ☐ No ☐
    - a. If not pending, what was the decision on appeal? \_\_\_\_\_
  5. Was the previous lawsuit based upon the same or similar facts asserted in this lawsuit? Yes ☐ No ☒

If so, explain: \_\_\_\_\_

II. Place of Present Confinement KENT COUNTY CORRECTIONAL FACILITY

If the place of present confinement is not the place you were confined when occurrence that is subject of instant lawsuit arose, also list the place you were confined: \_\_\_\_\_

## III. Parties

## A. Plaintiff(s)

Place your name in the first blank and your present address in the second blank. Provide the same information for any additional plaintiffs. Attach extra sheets as necessary.

Name of Plaintiff Charles Harry Madison  
 Address 1748 BOSTON SE GR MI- KENT COUNTY JAIL

## B. Defendant(s)

Complete the information requested below for each defendant in this action, including whether you are suing each defendant in an official and/or personal capacity. If there are more than four defendants, provide the same information for each additional defendant. Attach extra sheets as necessary.

Name of Defendant #1 LARRY STELMA  
 Position or Title SHERIFF - KENT COUNTY  
 Place of Employment KENT COUNTY CORRECTIONAL  
 Address 703 BALL AVE NE GRAND RAPIDS MI 49503

Official and/or personal capacity? OFFICIAL

Name of Defendant #2 DENNIS B LEIBER

Position or Title JUDGE

Place of Employment 17TH CIRCUIT COURT

Address 180 OTTAWA NW1 GRAND RAPIDS MI 49503

Official and/or personal capacity? OFFICIAL

Name of Defendant #3 KENT COUNTY CORRECTIONS

Position or Title \_\_\_\_\_

Place of Employment \_\_\_\_\_

Address 703 BALL AVE NE 49503

Official and/or personal capacity? OFFICIAL

Name of Defendant #4 CORIZON MEDICAL INC

Position or Title \_\_\_\_\_

Place of Employment KENT COUNTY JAIL

Address 703 BALL NE GRAND RAPIDS MI 49503

Official and/or personal capacity? OFFICIAL

Name of Defendant #5 \_\_\_\_\_

Position or Title \_\_\_\_\_

Place of Employment \_\_\_\_\_

Address \_\_\_\_\_

Official and/or personal capacity? \_\_\_\_\_

## IV. Statement of Claim

State here, as briefly as possible, the facts of your case. Describe how each defendant is personally involved. Include also, the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets if necessary.

### CLAIM #1 LIFE ENDANGERMENT, PERSONAL INJURY MEDICAL MALPRACTICE - FAILURE TO MEDICATE.

ON JUNE 27, 2012 I WAS ARRESTED AND TAKEN TO THE KENT COUNTY JAIL. I WAS PLACED IN A HOLDING CELL. I STARTED FEELING PAIN IN MY CHEST AND INFORMED THE GUARD I WAS HAVING CHEST PAINS. HE IGNORED ME. APPROX 20 MIN LATER THE PAIN INCREASING, I POUNDED ON THE DOOR OF THE CELL AND COMPLAINED ONCE AGAIN. TO NO AVAIL. ABOUT AN HOUR LATER, AFTER BANGING ON THE DOOR HE LET ME OUT TO SEE THE INTAKE NURSE. I TOLD HER I WAS HAVING CHEST PAINS, SHE TOOK MY BLOOD PRESSURE, IT WAS 220/120. SHE QUICKLY CHECKED MY HEART ON AN EKG MACHINE AND GAVE ME MEDICINE. I INFORMED HER I HAVE MALIGNANT HYPERTENSION. I TOLD HER I TAKE CATAPRESS 0.3 MG 4 TIMES DAILY OR AS NEEDED. I NEED 24 HOUR ACCESS TO MY MEDICINE. SHE INFORMED ME THAT THAT WAS AGAINST JAIL POLICY. THEY GAVE ME MY MEDICINE TWICE DAILY, 8 AM AND 8 PM. MY BLOOD PRESSURE AVERAGED ABOUT 200/110 DAILY.

ON JULY 7, 2012 I WAS INFORMED AT 7:00 AM TO PREPARE TO GO TO COURT. AT 7:30 AM THEY BEGAN TO MOVE ME FROM

MY CELL FOR TRANSFER. I INFORMED THEM I HAD YET TO RECEIVE MY MEDICINE. I WAS INFORMED I WOULD RECEIVE THEM DOWNSTAIRS. WHICH I DID NOT. I WAS TRANSFERRED TO COURT. ONCE DOWNTOWN AT THE COURTHOUSE I AGAIN START HAVING CHEST PAINS. TO WHICH I INFORMED THE GUARD. HE REPLIED I WOULD HAVE TO WAIT UNTIL I RETURNED TO THE JAIL. AT APPROX 11:00 AM I RETURNED TO THE JAIL, NO THE PAINS WERE SEVERE. I AGAIN COMPLAINED TO A GUARD. HE INFORMED ME I WOULD HAVE TO WAIT UNTIL I WAS TAKEN TO MY CELL FOR MEDICINE. AT 1:00 PM I WAS RETURNED TO MY CELL. I INFORMED OFFICER P. GREENE I WAS HAVING CHEST PAINS. HE CALLED MEDICAL, BUT GOT NO ANSWER. BECAUSE OF THE PAIN I LAID DOWN IN MY BUNK. AT 3:00 PM I SEE C.O. GREENE LEAVING AS IT IS THE END OF HIS SHIFT. I ASK HIM ABOUT MEDICAL, HE REPLIED, HE GOT NO ANSWER. AT APPROX. 3:15 PM I INFORMED THE 2<sup>ND</sup> SHIFT C.O. QUAKKAR OF MY PAIN, HE GOT MEDICAL ON THE RADIO. A NURSE CAME AND CHECKED MY PRESSURE, IT WAS 300 / 150, SHE CALLED AN AMBULANCE AND PUT ME ON AN EKG MACHINE.

THE AMBULANCE ARRIVED. THE NURSE GAVE THE EMT MY CHART AND THE EKG RESULTS. HE READ THEM, THEN TOLD HIS PARTNER, "THEY'RE GOING TO

KILL THIS GUY." AT THE HOSPITAL I STAYED 2 DAYS. THEY STABILIZED ME AND GAVE ME A STRESS TEST TO CHECK MY HEART. AT THAT TIME IT CHECKED OUT FINE. UPON RETURNING TO THE JAIL, THEY PUT ME IN THE INFIRMARY. WHICH IS SOLITARY CONFINEMENT. NO MAIL, NO VISITS, NO NOTHING. 3 DAYS, 3 TOUGH DAYS. MY BLOOD PRESSURE AGAIN AVERAGED 200/110.

ON JULY 20, 2012 AT APPROX 1:AM I STARTED HAVING CHEST PAINS AND DIZZINESS. I GOT OUT OF BED AND WENT TO THE BATHROOM AREA TO DRINK SOME WATER AND SPLASH SOME ON MY FACE. THE NEXT THING I REMEMBER IS LYING FLAT ON MY BACK, BEING ASKED IF I AM ALRIGHT BY DEPUTYS. I WAS IN EXTREME PAIN. BOTH MY CHEST AND HEAD. SOMEONE TOOK MY BLOOD PRESSURE AND SAID IT WAS 300/SOMETHING. A DEPUTY SAID "WE NEED TO GET HIM OUT OF HERE". A NURSE SAID TO LEAVE HIM HERE AND GIVE HIM SOME MEDICINE. THEY HELPED ME BACK TO MY BED. I BEGGED THEM TO HELP ME, THE PAIN WAS SO GREAT. SOMEONE BEGAN LAUGHING AT ME. ALL OF A SUDDEN MY MOUTH FILLED WITH BLOOD. I SPIT THE BLOOD OUT IN THE TRASH CAN NEXT TO MY BED. THEY SAW THE BLOOD AND SAID TO MOVE ME TO THE INFIRMARY. I PLEADED

WITH THEM NOT TO. REMEMBERING MY LAST EXPERIENCE IN THERE THEY TOOK ME ANYWAY. ONCE THERE THEY PUT ME IN A CELL AND CLOSE THE DOOR. I LAYED ON THE BED AND TRIED TO REST. STILL IN GREAT PAIN. THEN MY HEART STARTED POUNDING OUT OF CONTROL. I THOUGHT I WAS HAVING A HEART ATTACK. I PULLED THE EMERGENCY CORD. THE LIGHT FLASHED, BUT NO ONE RESPONDED. I STARTED POUNDING ON BOTH THE DOOR AND WINDOW OF THE CELL. THE NURSE FINALLY CAME AFTER ABOUT 20 MINUTES. I TOLD HIM I WAS HAVING A HEART ATTACK, HE HOOKS ME TO AN EKG AND SAYS MY HEART IS IN REFIB. AND BEGINS TO LEAVE, I BEGGED HIM NOT TO LEAVE BELIEVING I AM ABOUT TO DIE. BUT HE LEAVES AND CLOSES ME IN. HE COMES BACK 5-10 MIN LATER GIVES ME A PILL, DRAWS SOME BLOOD, AND LEAVES AGAIN, SAYING HE WILL CHECK ON ME IN 30 MIN OR SO. AFTER ABOUT AN HOUR MY HEART STOPS BEATING OUT OF CONTROL BUT STILL HURTS. IN THE MORNING THE DOCTOR COMES TO ME WITH "BAD NEWS". SHE SAID THAT MY BLOOD PRESSURE HAS BEEN OUT OF CONTROL EVER SINCE MY INCARCERATION. THAT MY HEART HAS BEEN LIKE A MARATHON RUNNER,



RUNNING A RACE EVERY DAY 24 HRS A DAY  
FOR A MONTH WITH NO REST. BECAUSE OF THAT  
I NOW HAVE CONGESTIVE HEART FAILURE AND  
THAT MY KIDNEYS SO SIGNS OF DAMAGE. I  
TOLD HER I HAVE BEEN IN CARE OF THE  
JAIL AND THAT I TOLD THE INTAKE NURSE HOW  
I TOOK MY MEDICINE MY FIRST DAY IN JAIL. SO  
SHE SET UP FOR ME TO TAKE MY MEDICINE  
HOW MY DOCTOR PRESCRIBED. WHICH THEY ONLY  
FOLLOWED FOR 2 DAYS. 3 DAYS THEY ACTUALLY  
GAVE ME THE WRONG MEDICINE. I HAVE  
CHARTED THE HISTORY SINCE BEING INFORMED OF  
MY HEART CONDITION.

SHERIFF LARRY STELMA, BECAUSE HE  
IS RESPONSIBLE FOR THE FACILITY

JUDGE DENNIS LEIBER, BECAUSE HE PUT ME  
IN JAIL WITHOUT BAIL - PREVENTING ME FROM  
MEDICAL TREATMENT

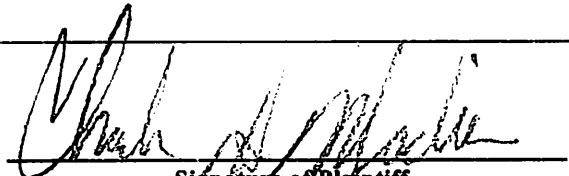
V. **Relief**

State briefly and precisely what you want the court to do for you.

ALLOW ME TO SEEK THE MEDICAL HELP  
I NEED.

PUNITIVE DAMAGES FOR DESTROYING MY  
HEART AND KIDNEYS

OCT 18, 2012.  
Date

  
Signature of Plaintiff

**NOTICE TO PLAINTIFF(S)**

The failure of a *pro se* litigant to keep the court apprised of an address change may be considered cause for dismissal.